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ATTORNEYS FOR DEFENDANTS

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 AMARILLO DIVISION**

IN RE	§	
AMERICAN HOUSING	§	Case No. 09-20232-rlj-11
FOUNDATION,	§	
Debtor	§	
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WALTER O'CHESKEY, AS	§	
CHAPTER 11 TRUSTEE,	§	
Plaintiff,	§	
vs.	§	Case No. 10-02126
CAMPBELL BURGESS, ET AL.	§	
Defendant.	§	
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WALTER O'CHESKEY, AS	§	
CHAPTER 11 TRUSTEE,	§	
Plaintiff,	§	
vs.	§	Case No. 10-02127
CAMPBELL BURGESS, ET AL.	§	
Defendant.	§	
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WALTER O'CHESKEY, AS	§	
CHAPTER 11 TRUSTEE,	§	
Plaintiff,	§	
vs.	§	Case No. 10-02128
HERRING FINANCIAL	§	
SERVICES, INC., ET AL.	§	
Defendant.	§	
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WALTER O'CHESKEY, AS	§	
CHAPTER 11 TRUSTEE,	§	
Plaintiff,	§	
vs.	§	Case No. 10-02130
HERRING NATIONAL BANK, ET AL.	§	
Defendant.	§	
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WALTER O'CHESKEY, AS	§	
CHAPTER 11 TRUSTEE,	§	
Plaintiff,	§	
vs.	§	Case No. 10-02131

MOTION FOR EXPEDITED HEARING REGARDING FIRST AMENDED CREDITORS' / DEFENDANTS' (I) OMNIBUS OBJECTION TO TRUSTEE'S MOTION TO UNABATE AND ENTER SCHEDULING ORDERS AND SET TRIAL DATES, (II) MOTION FOR REHEARING REGARDING MAY 21, 2013 ORDER TO LIFT ABATEMENT, AND (III) MOTION TO REESTABLISH ABATEMENT OF SO CALLED "SOFT MONEY" ADVERSARY PROCEEDINGS — Page 1 of 5

WILLIAM SCOTT, ET AL.
Defendant.

§
 §

WALTER O'CHESKEY, AS
CHAPTER 11 TRUSTEE,
Plaintiff,

§
 §
 §

vs.

DON STORSETH, ET AL.

§
 §

Case No. 10-02133

Defendant

MOTION FOR EXPEDITED HEARING REGARDING FIRST AMENDED CREDITORS' / DEFENDANTS' (I) OMNIBUS OBJECTION TO TRUSTEE'S MOTION TO UNABATE AND ENTER SCHEDULING ORDERS AND SET TRIAL DATES, (II) MOTION FOR REHEARING REGARDING MAY 21, 2013 ORDER TO LIFT ABATEMENT, AND (III) MOTION TO REESTABLISH ABATEMENT OF SO CALLED "SOFT MONEY" ADVERSARY PROCEEDINGS

The creditors shown in Table 1 below (the "Creditors") who are defendants in the above-captioned adversary proceedings, which adversary proceedings are also referenced in Table 1 below (collectively, the "Remaining Adversary Proceedings") file this *Motion for Expedited Hearing* regarding the *First Amended Creditors' / Defendants' (I) Omnibus Objection to Trustee's Motion to Unabate and Enter Scheduling Orders and Set Trial Dates, (II) Motion for Rehearing Regarding May 21, 2013 Order to Lift Abatement, and (III) Motion to Reestablish Abatement of so Called "Soft Money" Adversary Proceedings* (the "Motion to Abate") and in support thereof would show the Court the following.

Table 1	
Creditor / Defendant	Adversary Proceeding
11-02126	Banjo, Inc.
11-02126	Carson A. Burgess-Griffiths
11-02126	Carson Burgess
11-02126	Monarch Trust Company as Trustee of the Burgess Trust No. 4
11-02126	Terry Wright, as Co-Trustee of the Louise Johnson Thomas Trust and

Table 1	
Creditor / Defendant	Adversary Proceeding
	Cornelia Johnson Slempt Trust
11-02127	Banjo, Inc.
11-02127	C. C. Burgess
11-02127	Carson Burgess
11-02127	Charlotte Burgess
11-02127	Cornelia Slempt Trust
11-02127	Jessie Herring Johnston Trust #1
11-02127	Jessie Herring Johnston Trust #2
11-02127	Louise Johnson Thomas Trust
11-02128	C.C. Burgess
11-02128	Campbell Burgess
11-02128	Chain-C, Inc.
11-02128	Herring Financial Services
11-02128	Keevin Clark
11-02130	Herring National Bank
11-02130	Vaudry Capital, L.P.
11-02131	William E. Scott & William E. Scott IRA
11-02133	Clay Storseth
11-02133	Dennis Dougherty
11-02133	Don Storseth
11-02133	Estate of Frances Maddox
11-02133	Heron Land Company
11-02133	Paul King

1. The Creditors filed their original motion to abate on June 4, 2013.
2. The Creditors filed the Motion to Abate (i.e., the amended motion) on June 5, 2013.
3. Requested hearing date: June 20, 2013 Amarillo video docket call.
4. Reason for expedited hearing: An expedited hearing is requested so that:
 - a. the Motion to Abate can be determined before scheduling orders are entered and before any activity resumes in the Remaining Clawback Adversary Proceedings (as defined in the Motion to Abate);

- b. the Creditors may obtain clarity as to what they may face in terms of scheduling and litigation in the coming months.
- 5. Parties in interest: The Trustee is the only party in interest.
- 6. Notice is sufficient: Notice of the requested hearing date is sufficient considering that the docket call in question is fifteen days away from the date of the filing of this motion.
- 7. Reason why hearing was not previously requested: A hearing was requested as soon as practicable after the entry of the order lifting the abatement in the Remaining Clawback Adversary Proceedings.

WHEREFORE, the Creditors referenced and described above respectfully requests that the Court set the Motion to Abate (as defined above) for hearing on the June 20, 2013 Amarillo video docket call.. The Creditors respectfully request such other and further relief to which they are entitled at law or in equity.

Dated: June 7, 2013

Respectfully submitted:

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By: /s/ Joe Lovell
Joe Lovell

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendants has conferred with Barry Golden on June 6, 2013, regarding the relief requested in this Motion and Mr. Golden is opposed.

/s/ Joe Lovell
Joe Lovell

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Appeal was forwarded by regular first class mail, and/or by ECF notification, on June 7, 2013, to counsel for the trustee.

/s/ Joe Lovell
Joe Lovell